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Attorneys for Plaintiffs State of Utah, et al.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

BLUERIBBON COALITION, INC., *et al.*,

and

STATE OF UTAH, *et al.*,

Plaintiffs,

v.

U.S. BUREAU OF LAND MANAGEMENT,
et al.,

Defendants,

and

SOUTHERN UTAH WILDERNESS
ALLIANCE,

Intervenor-Defendant.

Case Nos. 2:23-cv-00923-DAK (lead)
4:24-cv-00046-DAK

**PLAINTIFFS' UNOPPOSED MOTION
FOR LEAVE TO AMEND COMPLAINT**

District Judge Dale A. Kimball
Magistrate Judge Jared C. Bennett

Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, Plaintiffs the State of Utah, *et al.*, hereby submit this Unopposed Motion for Leave to Amend Complaint. State Plaintiff's original complaint was filed on May 29, 2024,¹ which was later consolidated with the above-captioned case.² Plaintiffs' BlueRibbon Coalition, Inc., *et al.*, Federal Defendants, and Intervenor-Defendants have all indicated in writing that they do not oppose State Plaintiffs' Motion for Leave to Amend Complaint. State Plaintiffs seek to amend their original complaint because of a recent decision by this Court in a relevant case, *Kane Cnty v. United States.*, 2:10-cv-01073, (D. Utah, Aug. 9, 2024), Dkt. 792, which the State Plaintiffs believe will have significant implications for the above-captioned case. In accordance with Rule 15-1(a) of the Local Civil Rules for the District of Utah, State Plaintiffs have attached as exhibits both a copy of the Proposed Amended Compliant and a redlined version of the Proposed Amended Complaint comparing it with the original Complaint. Due to the time necessary for briefing following the State Plaintiffs filing of an Amended Complaint, State Plaintiffs have simultaneously filed a Motion to Amend the Scheduling Order, which seeks to amend the dates of the existing Scheduling Order previously issued by the Court on July 30, 2024.³ The State Plaintiffs have conferred with the parties, and all parties have agreed to the dates proposed in the State Plaintiffs' Motion to Amend the Scheduling Order.

DATED: August 30, 2024

Respectfully submitted,

¹ ECF No. 1, No. 4:24-cv-00046-DAK.

² ECF No. 63, No. 2:23-cv-00923-DAK-JCB.

³ ECF No. 65, No. 2:23-cv-00923-DAK-JCB.

/s/ Jake M. Garfield

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